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MB18-184 Petition for C4 / 73.215 Rule Changes

On September 12,1988, the Federal Communications Commission released a proposed rule making, (MM Docket No. 88-375) that would provide for the creation of the Class C3 FM, a new class of FM station. In that same rulemaking was a proposal for Class A stations to increase to a maximum of 6000 watts.

In the introduction of the proposal, the Commission stated the creation of the Class C3 and the increase of power of Class A FM stations would provide "additional opportunities for expanded coverage areas......to provide better service to their audiences." Further, the Commission notes that the Class 3 FM "would improve efficiency in the allocation, licensing, and use of the electromagnetic spectrum".

In the proposal, the Commission notes further that "we are persuaded that significant public benefits may indeed result from the creation of a new FM Class C 3 in Zone II". The Commission also states that this "would permit a number of current Class A stations to upgrade to the higher level facilities. Both results would bring more and better service to the radio audience."

Just as it was true in 30 years ago that service areas increased for some Class A stations upgrading to a Class C 3 and improved their signals, it is still true that an upgrade today to 12,000 watts would provide better coverage offering "more density" of signal for many current Class A properties. Manmade noise has increased over those 30 years. Many Class A stations now suffer from interference from nearby stations on adjacent channels broadcasting in HD that affect the signal in fringe areas. That is a situation that didn't exist thirty years ago.

As the owner of WRBF, Plainville, Georgia, the most common comment that I have heard from the audience is "Can you turn up the power? It's hard to hear your station sometimes."

I fully support the Class C4 / 73.215 petitions for rulemaking filed by MMTC and SSR Communications, MB 18-184 and urge the Commission to adopt the complete proposal.

WRBF must sell many communities in Northwest Georgia to be financially viable. There have been instances in our area during ice and snow storms that WRBF was the only commercial FM on the air in a 5 county area providing news and information reports. An opportunity to provide a stronger and more robust signal in our area could only benefit the listening audience.

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The amendment of Section 73.215 of the FCC rules would allow for short spacing if the upgraded station would protect the other station's actual contours, not just the theoretical or maximum permitted contour. This would be a huge benefit to many Class A stations allowing the upgrade to a C 4 status. And, it may benefit the re-vitalization of AM, by providing those stations still seeking an FM translator, a way to more easily find an acceptable frequency.

The elimination of spectrum warehousing in this amendment would benefit a select number of Class A upgrading to a C4 status by providing better coverage and more density of signal. This change in rules would follow the Commission's decision in 1988 to revise the minimum separation distances when the C3 Class of FM stations was created.

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